



Rian J. Wren  
Vice President  
Southwest States  
Local Services Organization

Suite 800  
5501 LBJ Freeway  
Dallas, TX 75240  
214-778-2595  
FAX: 214-778-2215

February 14, 1997

Mr. Stephen Carter  
Vice President, General Manager  
Southwestern Bell Telephone Company  
One Bell Center, Room 4110  
St. Louis, MO 63101

Dear Stephen;

I have reviewed Mr. Todd's letter of February 12, 1997, and my concern regarding the ability for AT&T/SWBT to deliver the electronic operational interfaces for ordering/provisioning on time has escalated to the point where I believe we are now in jeopardy. Mr. Todd's letter is unclear and evasive. The lack of clarity surrounding SWBT's positions leads us to believe that SWBT does not share AT&T's sense of urgency centered around resolving the critical implementation issues that remain unresolved.

I am requesting your personal attention and involvement in resolving the following business POTS issues as well as ensuring that the consumer implementation issues are closed by February 21, 1997, and the complex business services (PBX/DID trunks) issues are closed by February 28, 1997, as we agreed on the February 10, 1997, conference call.

Single FOC and Completion

AT&T cannot agree to relax the twenty-four hour FOC requirement. The twenty-four hour turnaround time in and of itself places AT&T at a significant disadvantage from a parity perspective in comparison to the timeframes SWBT provides the same type of information contained within the FOC to its customer service representatives. SWBT's customer service representatives have real-time access to the information contained within the EDI FOC and order completion transactions and are not required to wait 24 hours for critical information, e.g., real-time confirmation of due dates.

Through the negotiations, SWBT committed to provide a FOC and a completion for each order it receives from AT&T as described in the AT&T/SWBT Texas Interconnection Agreement in Resale Attachment 2, Paragraphs 4.3 and 4.4. Paragraph 4.3 also includes the terms and conditions associated with the 24 hour response agreement for the FOC. The OBF has approved the multiple line FOC and completion transactions and has finalized the transaction formats to support multiple lines and the corresponding relevant information. AT&T requests that SWBT identify the date by which it will be in a position to meet the agreements as specified in our Interconnection Agreement and support the industry standards governing these transactions.

Mr. Todd's letter describes "limitations on Resale (i.e., the inability to link the WTN to the SWB service order number and completion date/due date)". We do not understand what is meant by this statement. We are concerned that SWBT must be saying that upon receipt of an order from AT&T that contains multiple lines, SWBT will disaggregate the order into multiple orders and introduce manual processes to provision the service as ordered. It is my understanding that the Texas Commission ordered the operational date of June 1, 1997, as opposed to the earlier dates requested by AT&T in order to ensure that the need for manual processes would be eliminated. Perhaps the conclusion we have reached is not correct; if this is so, we request your assistance in understanding what exactly is being described in Mr. Todd's letter. If, on the other hand, our understanding is accurate, we request that SWBT 1) provide AT&T with the details describing how it will process orders it receives from AT&T that contain multiple lines; 2) if there is manual processing, how and when SWBT will comply with the Commission Arbitration Award and move to a fully mechanized environment.

#### Operating Company Numbers

We have been attempting to understand the issue surrounding SWBT's inability to accept a national OCN from AT&T for Resale since December 16, 1996, and as of this date we remain without a description of the actual issue. AT&T consulted with Bellcore regarding this issue in October, 1996, and received confirmation that in a Resale environment, state-level OCNs are not required and a national OCN is appropriate for AT&T's use when providing local service via Resale. We have confirmed that Bell Atlantic, BellSouth, Nynex, Pacific Bell, and GTE (multiple state Companies) have agreed to accept AT&T's national OCN. We recommend that as opposed to AT&T assuming the responsibility on behalf of SWBT to translate how the other RBOCs are addressing this issue, that SWBT contact its RBOC counterparts directly.

#### Jeopardies and Missed Due Dates

SWBT's response on this issue concerns me greatly with respect to our business relationship. I recall Rich Fowler pointing out during our February 10, 1997, conference call that Paragraph 4.7 in Resale Attachment 2 of the AT&T/SWBT Texas

Interconnection Agreement includes the words "when available" associated with jeopardies. Throughout our discussions surrounding this issue during the conference call and when we summarized the resolution of this item, SWBT did not advise AT&T that the resolution agreement was only for missed due dates. Be that as it may, SWBT agreed to provide the jeopardy information via the EDI interface "when available" last July through the negotiations process as codified in our Interconnection Agreement filed with the Texas PUC. We request that SWBT define the timeframe associated with "when available". It is our understanding from a series of test calls that we have placed to SWBT's customer care centers that SWBT does provide this level of information to its customer care centers in advance of missing a customer appointment or due date. Unless we reach an agreement with respect to how we will manage jeopardy notification, we will not have a process that is at least at parity with what SWBT provides to itself.

Mr. Todd states in his letter that SWBT believes "that further discussions are necessary to clarify the EDI "missed appointment" information". Our teams have discussed the details associated with the OBF transactions in numerous sessions and as a result, we do not know what information is still in question at this time. Please provide me with the specific clarifications that SWBT requires in order to understand the missed due date requirements.

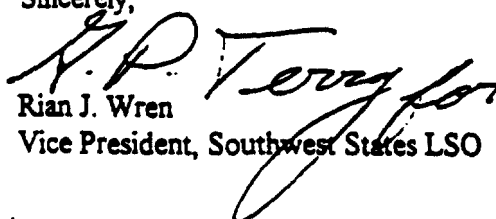
Hard/Fatal Edits

We understand SWBT's position regarding AT&T's request that SWBT relax its edits for an interim period of time and will work with SWBT to ensure that AT&T understands SWBT's edit structure prior to implementation. Although our teams have had discussions regarding the business rules that govern SWBT's edits, the risk exists that there may be misunderstandings regarding the rules. To that end, we will work with SWBT to conduct "robust" testing to identify any such cases prior to scheduling the end-to-end operational readiness testing with SWBT.

With implementation dates in jeopardy as a result of these issues remaining unresolved, we request your immediate attention and response to these items.

Stephen, my concerns are not only with these unresolved issues but also with the lack of clarity from SWBT with respect to open issues, definitions, etc. It is critical that our technical teams not be encumbered by ambiguity and that they clearly document agreements in order to ensure a successful implementation.

Sincerely,

  
Rian J. Wren  
Vice President, Southwest States LSO

**Exhibit ND-7**  
**2 Pages**

**EXHIBIT ND-7**

**SWBT FEBRUARY 10, 1997 RESPONSE TO AT&T  
ON RESALE IMPLEMENTATION ISSUES**

Alfred W. Todd, Jr.  
General Manager  
Regional Sales

Southwestern Bell Telephone  
1010 Pine, Room 8-E-11  
St. Louis, Missouri 63101  
Phone 314 236-8443  
Fax 314 331-9402



February 10, 1997

Mr. Greg Terry  
Southwestern States Local  
Infrastructure & Access Management  
Vice President  
AT&T  
5501 LBJ Freeway, Suite 435  
Dallas, Texas 75240

Dear Greg,

As you know, Mr. Wren's January 28, 1997, letter confirms that AT&T wishes to utilize SWBT Residential Easy Access Sales Environment (EASE) to perform Resale pre-ordering and ordering functions. We are very pleased to offer connectivity to this system and look forward to implementing the initial plan set forth between our companies in Dallas on January 30, 1997. The EASE implementation schedule John Powell provided to Ralph Scargall requested that initial connectivity to the EASE training database occur on February 6, 1997. As our teams have established, early this week we will have everything in place to make this connection and we feel that the remaining EASE deployment schedule is achievable. However, before connectivity is established, we need to obtain AT&T's agreement and acceptance of SWBT's position regarding the rates that will apply to AT&T's requested connectivity to EASE, as well as other OSS functions as indicated in the January 30, 1997 meeting.

I suggest that we use this letter to establish your acknowledgment of the applicability of rates to access SWBT Operations Support System (OSS). Subsequently we will need to incorporate rates into our Texas Interconnection Agreement. The rates are as provided below, however, please know there are very similar rates applicable for other SWBT states:

Upon access to one or more of the SWBT OSS functions (e.g., pre-ordering, ordering / provisioning, maintenance / repair, billing) in Texas SWBT will apply a System Access charge of \$ 3,200.00 per month.

Connection to the SWBT Remote Access Facility is required for EASE, CNA, Verigate, and DataGate. Connectivity may be established in two ways, which enables access functions for SWBT's 5 state territory. The following port charge(s) applicable to the connection method (dial vs. direct) and number of ports required:

- Direct Connection (56Kbs-1.54Mbps trunk) Port \$1580.00 per port per month
- Dial Up (28Kbs modem) Port rate(s) \$ 316.00 per port per month

Mr. Terry  
February / 0 , 1997  
Page 2 of 2

Note: The data transmission capacity of these ports referenced will translate to the number of users that can be supported. This number will depend upon the system(s) utilized and combined activity level of all users. Analysis will be required.

In the provision of Usage Billable Records and Local Disconnect Report Notifications SWBT applies a charge of \$.003 per message.

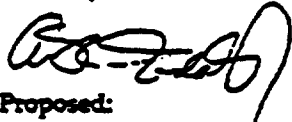
This represents SWBT's current OSS rate structure as applicable to any and all LSP access to the functions of pre-ordering, ordering, provisioning, repair / maintenance and billing. SWBT reserves the right to modify its rate structure in the future. Any custom development request will be considered on an individual case basis.

SWBT is offering a one-time, 90-day free access period to its OSS functions. The free access period begins when access is established to any function in a live mode. SWBT also offers a free 90-day evaluation period whereby SWBT software applications (e.g. CNA, EASE, etc.) and testing database are made available for evaluation and training purposes, as applicable. Note: The free access period does not apply to tariffed OSS functionality (e.g. Bill Plus<sup>SM</sup>).

I apologize for the tight timeframe and informality of this request. However, I believe you will agree that we have the most important issue in place, i.e., function availability. Please acknowledge AT&T's acceptance of SWBT's position regarding the application of rates and your agreement to resolve any rate dispute prior to utilizing OSS functions in a live environment by signing below. Please fax your reply to 314-331-9402. With this acknowledgment, SWBT will continue our OSS implementation actions.

By agreeing to provide access to SWBT OSS systems at the rates described herein, SWBT does not waive any legal arguments SWBT may have as to the appropriateness thereof.

Sincerely,



Proposed:

Please Circle One:

Rates Accepted

Rates Disputed - to be resolved

SWBT

AT&T

DATE

DATE

**EXHIBIT ND-8**

**AT&T FEBRUARY 11, 1997 RESPONSE TO  
SWBT PROPOSED RATES FOR ACCESS TO SWBT OSS**

Nancy



5501 LBJ Freeway  
PO Box 650345  
Dallas, Texas 75265-0345

February 11, 1997

Mr. Alfred W. Todd, Jr.  
General Manager  
Regional Sales  
Southwestern Bell Telephone  
1010 Pine, Room 8-E-11  
St. Louis, Missouri 65101

Dear Al,

This letter is in reply to your February 10, 1997 letter to Greg Terry regarding the rates SWBT proposes to charge for access to SWBT Operations Support Systems (OSS).

AT&T does not dispute the applicability of an OSS charge, however we need more time to analyze the specific rates proposed in your letter. Therefore, enclosed is your February 10 letter signed by me with the section "Rates Disputed - to be resolved" circled. As stated in your letter, this acknowledgment will result in SWBT moving forward with establishing the connectivity to EASE and proceeding with other EASE implementation activities.

I am the AT&T representative responsible for resolving the OSS rate level issue for all five SWBT states. It is my understanding that I need to work with Rich Fowler to reach an agreement on OSS rates. I plan to contact Rich immediately to begin discussions on this issue. If he is not the appropriate SWBT contact on this issue, I would appreciate it if you would identify the correct contact.

If you have any questions, please call me at (972) 778-2616.

Sincerely,

A handwritten signature in cursive script, appearing to read "Surendra Saboo".

Surendra Saboo  
Southwest Region Operations  
and Technical Planning  
Vice President

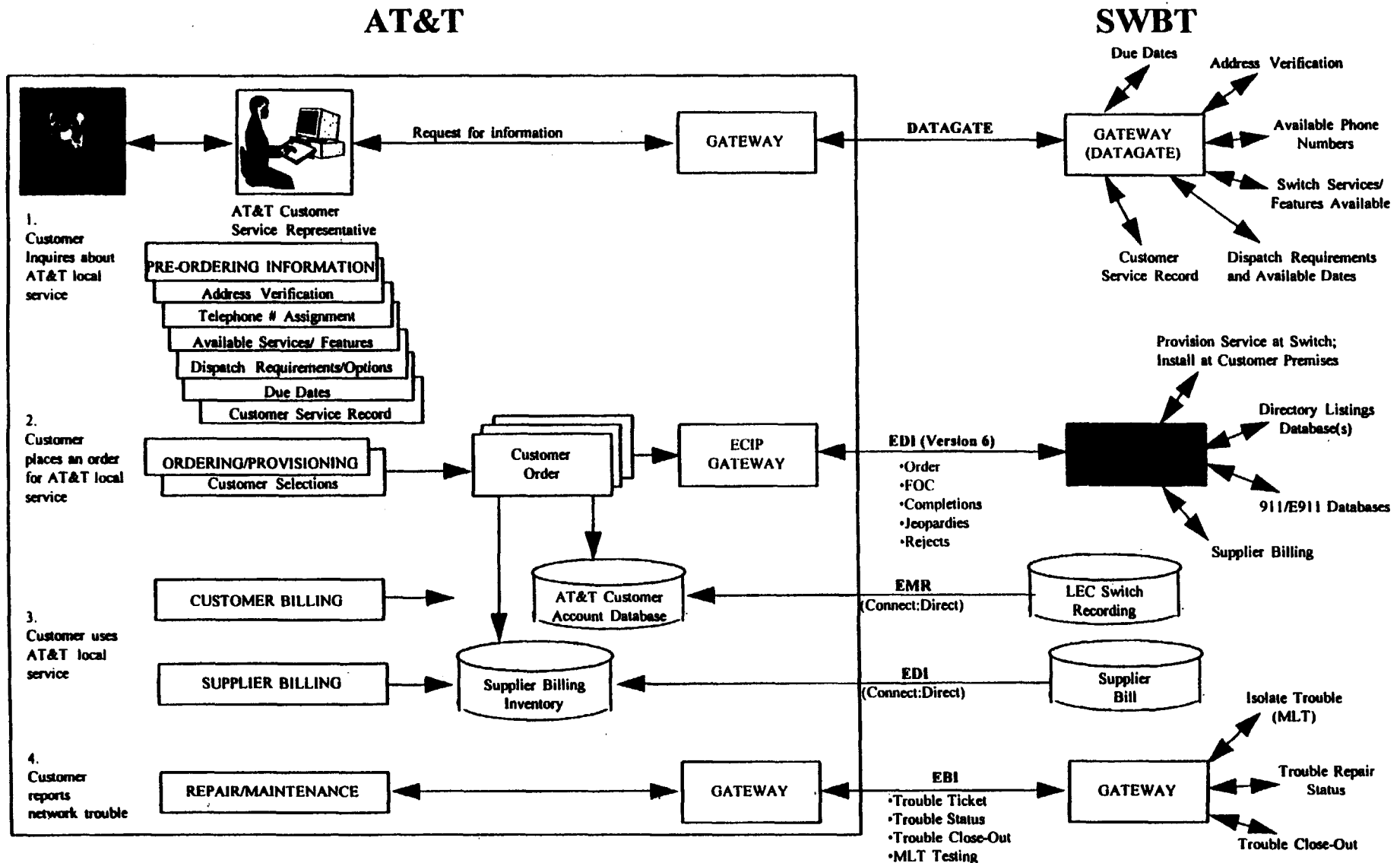
Enclosure



**Exhibit ND-9**  
**1 Page**

**EXHIBIT ND-9**  
**CONSUMER EASE**

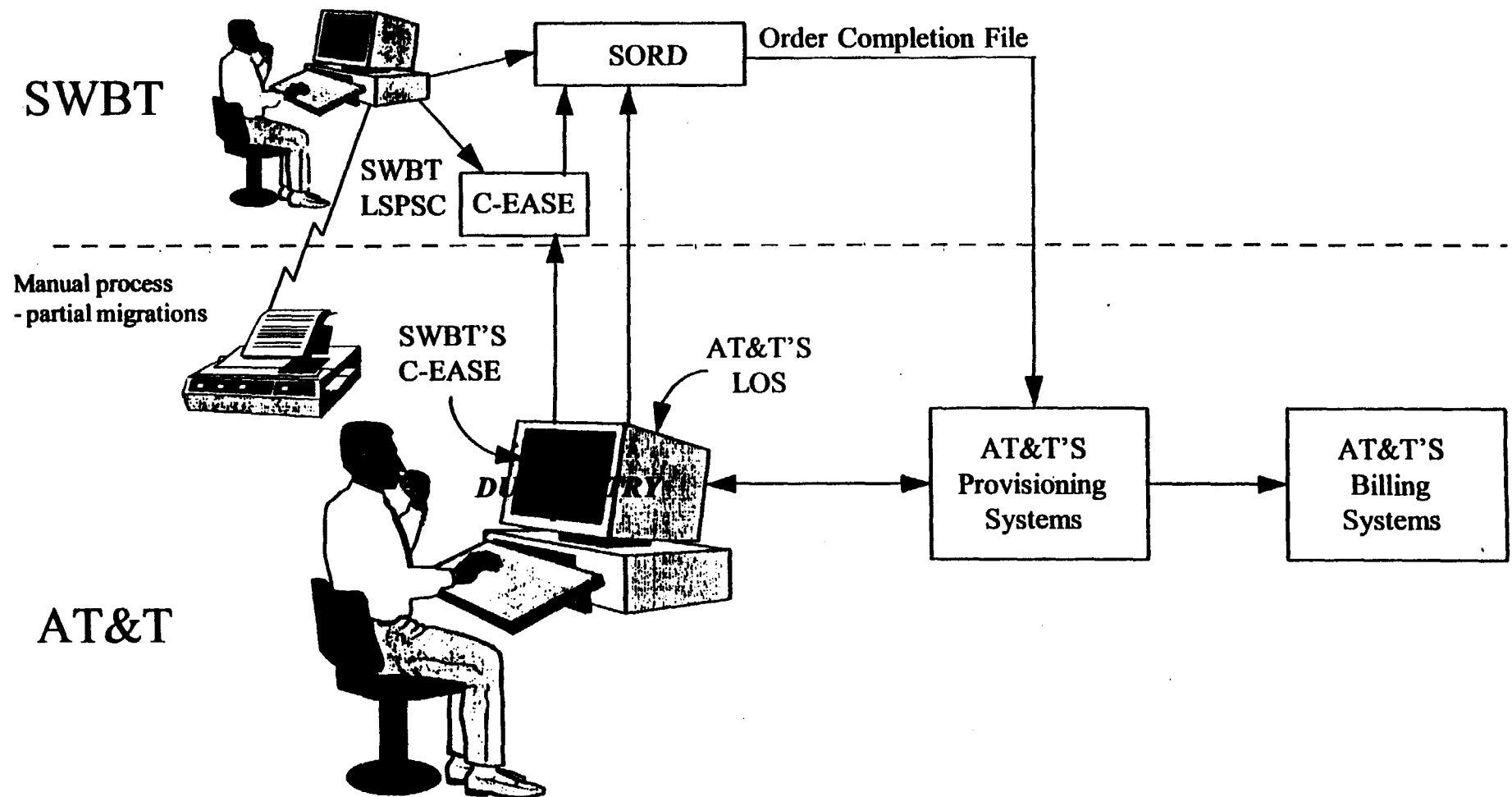
# Electronic Operational *Interface* Agreements



**Exhibit ND-2**  
**1 Page**

**EXHIBIT ND-2**  
**ELECTRONIC OPERATIONAL INTERFACE AGREEMENTS**

# Consumer EASE





FILED  
MAR 25 1997

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA  
OFFICE OF THE CLERK OF THE CORPORATION COMMISSION  
OF OKLAHOMA

APPLICATION OF ERNEST G. JOHNSON, )  
DIRECTOR OF THE PUBLIC UTILITY )  
DIVISION, OKLAHOMA CORPORATION ) Cause No. PUD 970000064  
COMMISSION TO EXPLORE THE )  
REQUIREMENTS OF SECTION 271 OF )  
THE TELECOMMUNICATIONS ACT OF 1996.)

AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
SUBMISSION OF REBUTTAL STATEMENT OF NANCY DALTON

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T")  
and submits the attached Rebuttal Statement of its witness, Nancy  
Dalton, in relation to the Commission's consideration of the above-  
referenced Application to Explore the Requirements of Section 271  
of the Telecommunications Act of 1996 ("FTA"). AT&T's Statement is  
filed in compliance with the Commission Order No. 409904 issued on  
February 28, 1997.

Respectfully submitted,

WHITE, COFFEY, GALT & FITE, P.C.

*Jack P. Fite* *DM*

Jack P. Fite, OBA #2949  
Jay M. Galt, OBA #3220  
6520 N. Western, Suite 300  
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Kathleen M. LaValle  
COHAN, SIMPSON, COWLISHAW & WULFF  
2700 One Dallas Centre  
350 North St. Paul Street  
Dallas, Texas 75201-4283

ATTORNEYS FOR AT&T COMMUNICATIONS  
OF THE SOUTHWEST, INC.

CERTIFICATE OF MAILING

This is to certify that on this 25th day of March, 1997, a true and correct copy of the above and foregoing AT&T COMMUNICATIONS OF THE SOUTHWEST, INC. SUBMISSION OF REBUTTAL STATEMENT OF NANCY DALTON was mailed, postage prepaid to:

Robert E. Goldfield  
Administrative Law Judge  
Oklahoma Corporation Commission  
Jim Thorpe Office Bldg  
First Floor  
Oklahoma City, OK 73105

Nancy M. Thompson, Esq.  
P. O. Box 18764  
Oklahoma City, OK 73154

John W. Gray  
Senior Assistant General Counsel  
Oklahoma Corporation Commission  
P. O. Box 52000-2000  
Oklahoma City, OK 73152-2000

Martha Jenkins, Esq.  
Sprint Communications  
Company, L.P.  
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Kansas City, MO 64114

Ernest G. Johnson, Director  
Public Utility Division  
Oklahoma Corporation Commission  
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101 Park Avenue, Suite 1000  
Oklahoma City, OK 73102

  
\_\_\_\_\_  
Jack P. Fite



BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF ERNEST G.  
JOHNSON, DIRECTOR OF THE  
PUBLIC UTILITY DIVISION,  
OKLAHOMA CORPORATION  
COMMISSION TO EXPLORE THE  
REQUIREMENTS OF SECTION 271  
OF THE TELECOMMUNICATIONS  
ACT OF 1996.

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§

Cause No. PUD 970000064

**REBUTTAL STATEMENT OF NANCY DALTON  
ON BEHALF OF  
AT&T COMMUNICATIONS OF THE SOUTHWEST**

**I. INTRODUCTION AND PURPOSE**

1. My name is Nancy Dalton. I am the same Nancy Dalton who filed a statement on behalf of AT&T Communications of the Southwest, Inc. (AT&T) in this proceeding.

2. I have reviewed the initial comments filed by Southwestern Bell Telephone Company - Oklahoma (SWBT). I also have reviewed the draft affidavits of Elizabeth A. Ham, Richard Keener, Nancy Lowrance regarding SWBT's alleged compliance with Section 271 of the Telecommunications Act of 1996 (the Act) with respect to nondiscriminatory access to operations support systems (OSS).

3. The purpose of my rebuttal statement is to provide updated information regarding AT&T's and SWBT's progress, or lack thereof, regarding unbundled network elements (UNE) and UNE operation support systems. As I indicated in my original statement filed with this Commission, the OSS negotiations, design, implementation, and testing is still in process. Therefore, it is important for this Commission to obtain the most updated information regarding the status of this issue.

## **II. SIGNIFICANT IMPLEMENTATION PROBLEMS CURRENTLY EXIST.**

### **A. Negotiations for OSSs for Unbundled Network Elements Remain at a Standstill.**

4. As I stated in my original Statement, AT&T has aggressively sought reliable and efficient OSS for unbundled network elements. As of the time that my affidavit was filed, I was still hopeful that negotiations, although slow, might result in future nondiscriminatory access to OSS for UNEs. However, since that time, I am now extremely doubtful that negotiations will result in any further movement by SWBT to implement proper and effective OSSs for UNEs.

5. Through a series of letters with SWBT negotiators, it has become apparent to me that SWBT is unwilling to consider implementation of OSSs for UNEs in any other fashion than as "special or design services." As is explained in my original Statement and in the Joint Statement of Steven Turner and Robert Falcone, SWBT insists on making UNEs available only as "special or design services," which essentially dooms the competitive viability of UNEs, and, therefore, facilities-based competition in the local market.

6. SWBT's position has not changed and, in fact, appears to have hardened. As a result, AT&T is and remains very concerned about its ability to provide service to customers through UNE when a customer has existing service and AT&T namely wants to migrate the customer, as is, with no change to the physical serving arrangement. I expressed my concerns to Mr. Gary Juhl, Director - Competitive Assurance, SWBT, in a letter dated March 13, 1997, in which I stated:

in Texas. paint a far different picture than that presented by SWBT in the draft affidavits presented by SWBT to the Oklahoma Corporation Commission concerning OSSs. Unlike the February 28, 1997, joint status report, SWBT filed this latest report without consultation with AT&T. As a result, AT&T filed a response to the SWBT report noting that the parties were still very far apart in the negotiations on UNE OSSs notwithstanding specific clarification by the Texas Commission on March 5. See, AT&T Response to SWBT Status Report, dated March 21, 1997, attached as Exhibit ND-11.

11. Therefore, as of the time that I am filing this rebuttal statement, I maintain my conclusion that the required OSS functionality, particularly for UNEs, as required by the Federal Act and FCC Orders, are not operationally ready. Additional testing and implementation issues must be completed for Resale OSSs before these interfaces can be considered operationally ready. Significant negotiations, development, design, implementation, and testing must be completed before the UNE OSSs are operational ready. Until SWBT can establish that it has electronic interfaces for Resale and UNEs that will support AT&T's and other competitive local exchange carrier's anticipated volumes of transactions, then SWBT should not be allowed to enter the interLATA market.

12. Entry will occur first via resale and the UNE platform. Both involve what should be software-based changes. However, rather than working to make this happen for UNE, SWBT is working to make it not happen, doing all it can to make what should be a simple process complicated -- for competitors and customers.

**VERIFICATION**

**STATE OF TEXAS**

§

**COUNTY OF** Dallas

§

I, NANCY DALTON, of lawful age, being first duly sworn, now state: that I am authorized to provide the foregoing statement on behalf of AT&T; that I have read the foregoing statement; and the information contained in the foregoing statement is true and correct to the best of my knowledge and belief.

Nancy M. Dalton  
Nancy Dalton  
AT&T

SUBSCRIBED AND SWORN TO BEFORE ME this 2<sup>nd</sup> day of March, 1997.

Judith Smith Oglesby  
Notary Public

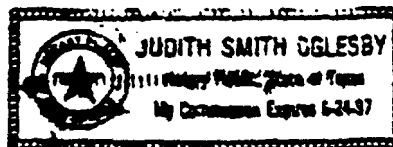


Exhibit ND-10  
11 Pages

**EXHIBIT ND-10**

**SOUTHWESTERN BELL TELEPHONE COMPANY MARCH 17, 1997  
REPORT TO TEXAS PUBLIC UTILITY COMMISSION ON  
STATUS OF REAL-TIME ELECTRONIC INTERFACES**



March 17, 1997

97 MAR 17 PM 3:58  
PUC  
3-17

Merrie M. Cavanaugh  
Attorney

Ms. Paula Mueller  
Secretary of the Commission  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
Austin, Texas 78701

Re: Docket Nos. 16189, 16196, 16226, 16285 and 16290

Dear Ms. Mueller:

Enclosed for filing is the original and thirty (30) copies of Southwestern Bell Telephone Company's ("SWBT") March Progress Report for Electronic Interfaces. In filing this report as required by Award paragraph 25, SWBT does not waive any legal arguments that the Arbitration Award, associated orders and resulting "Agreements" are in whole or in part, unlawful, and SWBT has reserved its right to appeal or seek review of the actions of Texas or federal legislative bodies, courts, or regulatory agencies of competent jurisdiction.

Sincerely,

Merrie M. Cavanaugh  
Attorney

Enclosures

cc: Honorable Kathleen Hamilton, Administrative Law Judge, PUC  
(hand delivered)  
Bill Magness, Office of Policy Development, PUC (hand delivered)  
Vicki Oswalt, Office of Policy Development, PUC (hand delivered)  
Carole Vogel, Office of Regulatory Affairs, PUC (hand delivered)  
Kevin Zarling, Assistant Director-Legal Division, PUC (hand delivered)  
Central Records, PUC (hand delivered)  
All Parties of Record (hand delivered)

1616 Guadalupe, Room 600  
Austin, Texas 78701-1298

Phone 512 870-5703  
Fax 512 870-3420

**SWBT STATUS REPORT ON NEW ELECTRONIC INTERFACES  
FOR PRE-ORDER AND ORDERING AND PROVISIONING FUNCTIONS FOR RESALE SERVICES**

<b>FUNCTION (from AT&amp;T Exhibit 15A)</b>	<b>SWBT AVAILABILITY (from AT&amp;T Exhibit 15A) <sup>1</sup></b>	<b>SWBT STATUS REPORT AS OF MARCH 15, 1997</b>
		<b>RESALE</b>
<b>PRE-ORDER</b>		
Address Verification	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2</sup>
Service/Features Availability	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2</sup>
Telephone Number Assignment	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2</sup>
Dispatch Schedule	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2</sup>
Due Date	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2</sup>
Customer Service Record (CSR)	1/1/97C	Development of this functionality is complete for non-complex services. SWBT internal testing completed. Ready for testing by LSPs. <sup>2</sup> Complex CSR functionality will be complete by 4/15/97. Enhanced development continues to provide additional fields by 5/1/97. Additional fields include IDENT, SA, LIST.

<sup>1</sup> AT&T and SWBT are working cooperatively to implement the functionality required for the pre-ordering and ordering/provisioning interfaces by June 1, 1997 with testing capabilities available April, 1997. AT&T and SWBT are focusing on these interface availability dates in totality as opposed to the individual functionality dates in this column

<sup>2</sup> "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

		SIC and BILL.
<b>POTS ORDERING &amp; PROVISIONING</b>		
Migration (Convert Customer As Is)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,3,4</sup> S&E recap must be supplied by LSP.
Migration With Changes (Convert with changes)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,3,4</sup> S&E recap must be supplied by LSP.
- Add/Disc Class Features	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,3,4</sup> S&E recap must be supplied by LSP.
- Add/Disc Blocking (1+, 0+, 011)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,3,4</sup> S&E recap must be supplied by LSP.
- PIC and PIC Freeze	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,3,4</sup> S&E recap must be supplied by LSP.
- Add/Disc Essential Lines	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,3,4</sup> S&E recap must be supplied by LSP.
- Add/Disc Additional Lines	1/1/97C	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,3,4</sup> S&E recap must be supplied by LSP.
- Directory Listing Changes	2/1/97C	Development of this functionality for straight line listings is complete. SWBT ready for internal testing for straight line listings. <sup>1</sup> EDI mappings for non-straight line listings have not been defined. AT&T and SWBT will mutually establish capabilities beyond straight-line testing outside of the implementation plan.
Partial Migration (Line/WTN vs. Account Level)	4/1/97- 7/1/97T	Business Scenarios are same as full migrations. Development is in progress. <sup>1,2</sup>

<sup>1</sup> "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBI/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

<sup>2</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

<sup>4</sup> SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature codes will be defined by SWBT.



New connects		
- Single Line	2/1/97C	EDI mapping requirements received from AT&T on 1/13/97. Development of this functionality with straight line directory listings was completed on 2/1/97. SWBT is currently performing internal testing. <sup>3,4</sup>
- Multi-Line (Less Than 30 Lines)	2/1/97C	EDI mapping requirements received from AT&T on 1/13/97. Development of this functionality with straight line directory listings was completed on 2/1/97. SWBT is currently performing internal testing. <sup>3,4</sup>
- Projects (Large Job - add'l facilities/coordinated work effort required - need SWBT criteria)	7/1/97T	Pre-order information must be requested prior to sending a firm order via EDI. <sup>3,4</sup> Preliminary definitions of business scenarios and documentation provided to AT&T 3/6/97. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.
Disconnects	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>3,3</sup>
Change Orders		
- Add/Disc Class Features	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>3,4</sup>
- Simple Number Change	3/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>3,4</sup>
- Add/Disc Blocking	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>3,4</sup>
- PIC and Local PIC Change	4/1/97C	Development of the functionality for PIC Change is complete. SWBT is currently performing internal testing. <sup>3</sup> Development of Local PIC Change functionality is complete and will be made available when equal access to Intral.ATA toll is

<sup>1</sup> "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where ODF/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

<sup>3</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

<sup>4</sup> SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature codes will be defined by SWBT.